

# **EXHIBIT C**

Robert M. Carlson  
CORETTE POHLMAN BLACK CARLSON MICKELSON & JOHNSTON  
P. O. Box 509  
Butte, Montana 59703  
(406) 723-3205

Attorneys for Defendant E.I. DUPONT DE NEMOURS AND COMPANY

UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

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LOUIS ALEKSICH, RAINELLE ALEKSICH,  
and LOUIS ALEKSICH, guardian ad litem  
for BRENT ALEKSICH, a minor,

USCA No. \_\_\_\_\_

USDC No. CV-91-5-BU-PGH

Plaintiffs/Appellees,

v.

REMINGTON ARMS CO.,  
and E.I. DUPONT DE NEMOURS  
AND COMPANY,

Defendants/Appellants.

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APPELLANT'S MOTION TO FILE DOCUMENTS UNDER SEAL

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COMES NOW appellant E.I. DuPont De Nemours and Company (DuPont), by and through its counsel of record, Corette Pohlman Black Carlson Mickelson & Johnston, and hereby moves this Court for an Order requiring that all documents filed pursuant to this appeal, including but not limited to the transcript, civil appeals docketing statement and attachments, the various district court orders, and the parties' briefs, exhibits, and excerpts of record be filed with this Court under seal and be kept confidential during the pendency of this appeal. DuPont further requests that any argument or hearing in this matter be kept confidential.

DATED this 24th day of January, 1996.

CORETTE POHLMAN BLACK CARLSON  
MICKELSON & JOHNSTON

By Robert A. Carl  
P.O. Box 509  
Butte, MT 59701  
Attorneys for Defendant,  
E.I. DUPONT DE NEMOURS & CO.

CERTIFICATE OF SERVICE

This is to certify that the foregoing was duly served by mail upon attorneys of record at their address or addresses this 24th day of January, 1996.

Mr. William P. Joyce  
Burgess, Joyce & Whelan  
2801 South Montana Street  
Butte, Montana 59701

Mr. Richard C. Miller  
Monsees, Miller & DeFeo, P.C.  
Attorneys at Law  
300 South Jefferson, Suite 600  
Springfield, MO 65806

Mr. A. Lance Tonn  
Lucas & Monaghan, P.C.  
Attorneys at Law  
P. O. Box 728  
Miles City, MT 59301

Mr. John W. Shaw  
Bryan, Cave LLP  
3500 One Kansas City Place  
1200 Main Street  
P.O. Box 419914  
Kansas City, MO 64141-6914

Mr. Paul S. Diamond  
Packard Bldg., 14th Floor  
111 South 15th Street  
Philadelphia, PA 19102

CORETTE POHLMAN BLACK CARLSON  
MICKELSON & JOHNSTON

By Sharon Shurtliff

Robert M. Carlson  
CORETTE POHLMAN BLACK CARLSON MICKELSON & JOHNSTON  
P. O. Box 509  
Butte, Montana 59703  
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Defendants/Appellants.

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**MEMORANDUM IN SUPPORT OF DUPONT'S MOTION TO FILE UNDER SEAL**

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COMES NOW defendant E.I. Dupont De Nemours and Company (DuPont) and submits this memorandum in support of its motion for an Order filing all documents relating to this appeal under seal.

This is an appeal from a Memorandum and Order of the district court dated December 22, 1995, denying appellants DuPont and Remington's application for sanctions. Appellants moved for sanctions arguing that Richard C. Miller, counsel for appellees, had violated the district court's Order dated May 11, 1995, sealing the record in this case and requiring that the proceedings be kept confidential.

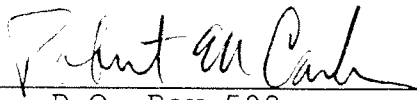
DuPont respectfully submits that maintaining this seal of confidentiality is important to protect the interests of appellants in this matter. These interests were initially protected through the district court's Order of May 11, 1995. The purpose of appellants'

application for sanctions was to enforce the protection granted by the district court's Order.

Based on the foregoing and the record to date in the district court, DuPont respectfully requests that this Court issue an Order requiring that all documents filed with the Court relating to this appeal be kept confidential and maintained under seal and that any hearing or argument held in this matter be confidential.

DATED this 24th day of January, 1996.

CORETTE POHLMAN BLACK CARLSON  
MICKELSON & JOHNSTON

By   
P.O. Box 509  
Butte, MT 59701

Attorneys for Defendant,  
E.I. DUPONT DE NEMOURS & CO.

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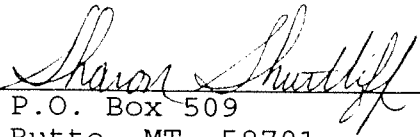
Mr. Richard C. Miller  
Monsees, Miller & DeFeo, P.C.  
Attorneys at Law  
300 South Jefferson, Suite 600  
Springfield, MO 65806

Mr. A. Lance Tonn  
Lucas & Monaghan, P.C.  
Attorneys at Law  
P. O. Box 728  
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3500 One Kansas City Place  
1200 Main Street  
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MICKELSON & JOHNSTON

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